KESTREL HORIZONS ™

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Subject: Comments on the Remedial Investigation Report for the EIP

Gentlemen:

On behalf of Shell J. Bleiweiss, counsel for Lindy Manufacturing, Kestrel Horizons has reviewed the draft Remedial Investigation report for the Ellsworth Industrial Park, Operable Unit No. 1, February 2009. The following comments provide a summary of our review. We have focused our attention on the Lindy Manufacturing facility and Area G.

1. EPA has improperly drawn the extent of contamination line on Figures 6-11a, c and g. These lines infer a sense of continuity between the data points and suggest that there is some interdependence in the data set. Inspection of several points reveals this is not the case. Table 1, shows the concentration of the primary and secondary solvents found in soil samples EIP-SS142, Fusibond, and EIP-SS284, Lindy. These samples sites are approximately 100 feet apart and are on opposite sides of Katrine Ave. Note that the elevated concentrations on Lindy are at 22.5 to 25 and 25-27.5 fbgs and at Fusibond are at 14-16 fbgs. The report provides no explanation as to how the contamination reached these various elevations. The concentrations at Lindy in a sample closer to ground surface, SS284 (15-17.5 fbgs), which is nearly the same as

the elevation for the Fusibond sample, are well below the standards. It is equally appropriate to conclude that there is no connection between these two sample sites, in terms of fate and transport. Thus, drawing lines connecting these two areas as EPA has done is inappropriate and the lines should be removed from the report.

2. Figure 3-10 shows that groundwater flow in the alluvial aquifer is to the south. Figure 5-24 shows that there are three wells upgradient of Lindy – LD1i, BD4i and EIP-9. All of these wells have detectable concentrations of some of the primary and secondary chlorinated solvents and all of these wells are screened in the alluvial aquifer. See the following table.

Well	Parameter & Concentration (ppb)	Source
LD1i	TCE – 3.1	p. 3 of Table 6-9g
EIP-9	1,2 DCA - 2	p. 2 of Table 6-9m and p.11 of Table D-4m
	TCE - 6	
	PCE – 0.6J	
BD4i	1,1,1-TCA – 1.2 & 2.5 on two dates	p. 9 of Table D-4m
	1,1-DCA – 1.6	
	PCE – 0.53	
	TCE – 23 & 9.2 on two dates	

These data indicate that there is a source(s) of primary and secondary chlorinated solvents north of Lindy. EPA has not thoroughly investigated these potential sources and thus it is not possible to differentiate changes in groundwater quality resulting from potential releases at Lindy from releases north of Lindy. EPA should conduct additional investigations to determine the actual impacts from all the potential sources before a proper Feasibility Study can be developed.

3. Section 6.4.2.7 addresses the soil contamination in Area G and provides estimated quantities of affected soils. All of the subsections dealing with Lindy are flawed. The essential problems with this section include:
    a. Groundwater should not be considered as a risk factor in Operable Unit No. 1. The entities within the EIP don't use groundwater and there are no wells supplying potable water located within the EIP. Apparently there is one municipal well that is no longer in use, in close proximity to the EIP. There are a number of alternative methods that will provide potable water in an amount equivalent to that provided by this well, that don't require remediation of groundwater throughout the EIP. One of the purposes of the FS is to identify and evaluate alternative strategies for accomplishing this requirement. Thus, it is incorrect to identify soils for removal or treatment based on leaching to groundwater.
    b. There are institutional control measures or other ways to manage the exposure of a current and future utility or construction workers within areas of the EIP where worker exposure concentrations will not be exceeded. For example, deed restrictions could limit the work to properly

trained and certified personnel. It is incorrect to presumptively identify these areas for removal or treatment at this time without conducting a FS where alternative approaches can be thoroughly examined.

c. EPA should not rely on models to estimate the concentration of the COCs inside affected buildings. Rather, they should collect samples in the breathing zone of representative work environments. This is a much superior method for determining worker exposure.

d. EPA has improperly interpolated the data by simply "connecting the dots" on Figures 6-11a, c and g. At each of these sample locations the concentrations of the COCs are at different depths with a different mixture of parameters. A more comprehensive analysis involving collection of additional field data is required to identify each area of concern and identify alternative remedial options in the FS.

4. Figures 6-20 through 6-27 are flawed. EPA has drawn elaborate contours based on too few data points. Any number of interpretations are possible in addition to these speculated by EPA. With the available data EPA can only identify general areas of contamination but not draw these plume maps. Those portions of the plumes that encompass more than one company (potential source area) are based on only a few data points. Extrapolating this information to cover large areas is inappropriate. These maps should be redrawn to eliminate the contour lines and replace them with smaller areas of "elevated concentrations".

Sincerely,

David G. Nichols, Principal

Harry H. Morris, Principal

cc: Shell J. Bleiweiss

Table 1 (excerpted from pages 7 and 39 of Table 6-6g of the RI)
Chemical Constituents Exceeding Migration to Groundwater Screening Criteria in Soil - Study Area G
Ellsworth Industrial Park Site
Downers Grove, Illinois

Location ID	EIP-SS142	EIP-SS142	EIP-SS284	EIP-SS284	EIP-SS284
Property	Fusibond Systems	Fusibond Systems	Lindy	Lindy	Lindy
Address	2615 Curtiss	2615 Curtiss	5200 Katrine	5200 Katrine	5200 Katrine
Field Sample ID:	EIP-SS142-014-1	EIP-SS142-014-2	EIP-SS284-015-1	EIP-SS284-023-1	EIP-SS284-025-1
Sampling Date:	12/11/2006	12/11/2006	2/2/2007	2/2/2007	2/2/2007
Sampling Depth (feet bgs):	14-16	14-16	15-17.5	22.5-25	25-27.5
Primary and Secondary Chlorinated Solvents (ug/kg)					
1,1,1-TCA	ND	17	ND	20 J	ND
1,1-DCA	ND	ND	ND	ND	ND
1,1-DCE	ND	ND	ND	ND	ND
1,2-DCA	ND	ND	ND	ND	ND
PCM	ND	ND	ND	ND	ND
CIS-1,2-DCE	ND	5.5 J	ND	46	24 J
PCE	ND	ND	ND	ND	ND
TRANS-1,2-DCE	ND	ND	ND	ND	ND
TCE	189.42	150 J	22	840	600
VC	ND	ND	ND	ND	ND

Yellow highlighting indicates an exceedance of screening criteria